

**Proposed Order**

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

<b>In re:</b>	§	<b>Chapter 11</b>
	§	
<b>FIELDWOOD ENERGY III LLC, et al.,</b>	§	<b>Case No. 20-33948 (MI)</b>
	§	
	§	<b>(Jointly Administered)</b>
<b>Post-Effective Date Debtors.<sup>1</sup></b>	§	

**ORDER SUSTAINING PLAN ADMINISTRATOR'S FIFTH OMNIBUS OBJECTION  
TO CLAIMS PURSUANT TO SECTION 502(b) OF THE BANKRUPTCY CODE AND  
RULE 3007 OF THE FEDERAL RULES OF BANKRUPTCY PROCEDURE  
SEEKING TO DISALLOW CERTAIN CLAIMS**

**(LATE FILED CLAIMS)**

[Related Docket No. \_\_\_\_]

Upon the *Plan Administrator's Fifth Omnibus Objection to Claims Pursuant to Section 502(b) of the Bankruptcy Code and Rule 3007 of the Federal Rules of Bankruptcy Procedure Seeking to Disallow Certain Claims (Late Filed Claims)* (the "Objection")<sup>2</sup> of the administrator of the chapter 11 plan (the "Plan Administrator") of the above-captioned reorganized debtors (collectively, the "Debtors," as applicable, and after the effective date of their plan of

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<sup>1</sup> The Post-Effective Date Debtors, along with the last four digits of each Post-Effective Date Debtor's federal tax identification number, as applicable, are: Fieldwood Energy III LLC (6778); Fieldwood Energy Offshore LLC (4494), Fieldwood Energy Inc. (4991), GOM Shelf LLC (8107), and FW GOM Pipeline, Inc. (8440). Fieldwood Energy III LLC, Fieldwood Energy Offshore LLC, and Fieldwood Energy Inc. are managed and operated by the Plan Administrator, whose primary mailing address is 16255 Ventura Blvd., Suite 440, Encino, CA, 91436, C/O of Province LLC. GOM Shelf LLC and FW GOM Pipeline, Inc. (collectively, the "Post-Effective Date FWE I Subsidiaries") are managed and operated by Jon Graham, as sole manager of each Post-Effective Date FWE I Subsidiary. The Debtors in the other nine pending chapter 11 cases (which continue to be jointly administered with the cases of the Post-Effective Date Debtors), each of which have either been dissolved or merged into other entities as of the Effective Date, consist of the following: Dynamic Offshore Resources NS, LLC (0158); Fieldwood Onshore LLC (3489); Fieldwood SD Offshore LLC (8786); Fieldwood Offshore LLC (2930); Bandon Oil and Gas GP, LLC (9172); Bandon Oil and Gas, LP (9266); Fieldwood Energy SP LLC (1971); Galveston Bay Pipeline LLC (5703); and Galveston Bay Processing LLC (0422).

<sup>2</sup> Capitalized terms used but not defined herein shall have the meanings ascribed to them in the Objection.

reorganization, the “Reorganized Debtors”), seeking entry of an order (this “Order”) disallowing the Late Filed Claims identified on **Schedule 1** attached hereto, it is **HEREBY ORDERED THAT:**

1. Pursuant to Section 502(b) of the Bankruptcy Code and Bankruptcy Rule 3007, each Late Filed Claim identified as a “Claim To Be Disallowed” on **Schedule 1** to this Order is disallowed in its entirety.

2. The Debtors’ Claims Agent is authorized and directed to update the claims register maintained in these chapter 11 cases to reflect the relief granted in this Order.

3. Each claim and the objections by the Plan Administrator to each claim identified in **Schedule 1** constitutes a separate contested matter as contemplated by Bankruptcy Rule 9014. This Order will be deemed a separate order with respect to each Late Filed Claim.

4. Except as otherwise provided in this Order, nothing in this Order shall be deemed: (a) an admission as to the validity of any prepetition claim against a Debtor entity or such Debtor entity’s estate; (b) a waiver of any party’s right to dispute any prepetition claim on any grounds; (c) a promise or requirement to pay any prepetition claim; (d) an implication or admission that any particular claim is of a type specified or defined in this Objection or any order granting the relief requested by this Objection; (e) a request or authorization to assume any prepetition agreement, contract, or lease pursuant to section 365 of the Bankruptcy Code; or (f) a waiver of the Plan Administrator’s rights under the Bankruptcy Code or any other applicable law.

5. The terms and conditions of this Order will be immediately effective and enforceable upon its entry.

6. The Plan Administrator, the Claims Agent, and the Clerk of the Court are authorized to take all actions necessary to effectuate the relief granted pursuant to this Order in accordance with the Objection.

7. This Court shall retain exclusive jurisdiction to resolve any dispute arising from or related to this Order.

Dated: \_\_\_\_\_, 2021

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MARVIN ISGUR  
UNITED STATES BANKRUPTCY JUDGE

**Schedule 1**

Late Filed Claims

**Schedule 1**  
**Late Filed Claims**

In re:Fieldwood Energy LLC, et. AL  
Case No 20-33948 Jointly Administered

	Claim #	Debtor	Name and Address of Claimant	Secured	Administrative	Priority	Unsecured	Total
<b>Claim To Be Disallowed</b>	<b>929</b>	20-33948 (MI) Fieldwood Energy LLC	<b>Creditor:</b> BrandSafway Solutions LLC  Attn.: Brendan Dunphy 22-08 Route 208 South Fair Lawn, NJ 07410	\$0.00	\$0.00	\$0.00	\$29,282.60	\$29,282.60
	<b>Filed On:</b>	2/12/2021						
	<b>Applicable Bar Date:</b>	11/25/2020						
	<b>Comments:</b>	Claim was filed after Applicable Bar Date.						
<b>Claim To Be Disallowed</b>	<b>948</b>	20-33948 (MI) Fieldwood Energy LLC	<b>Creditor:</b> Galvotec Corrosion Services, LLC  300 Bark Dr. Harvey, LA 70058	\$0.00	\$0.00	\$0.00	\$10,569.81	\$10,569.81
	<b>Filed On:</b>	3/5/2021						
	<b>Applicable Bar Date:</b>	11/25/2020						
	<b>Comments:</b>	Claim was filed after Applicable Bar Date.						
<b>Claim To Be Disallowed</b>	<b>884</b>	20-33948 (MI) Fieldwood Energy LLC	<b>Creditor:</b> KBC Advanced Technologies, Inc.  15021 Katy Freeway, Suite 600 Houston, TX 77094	\$0.00	\$0.00	\$0.00	\$22,254.80	\$22,254.80
	<b>Filed On:</b>	1/15/2021						
	<b>Applicable Bar Date:</b>	11/25/2020						
	<b>Comments:</b>	Claim was filed after Applicable Bar Date.						
<b>Claim To Be Disallowed</b>	<b>892</b>	20-33948 (MI) Fieldwood Energy LLC	<b>Creditor:</b> Loyens & Loeff N.V.  Parnassusweg 300 Amsterdam, 1081 LC	\$0.00	\$0.00	\$0.00	\$37,239.98	\$37,239.98
	<b>Filed On:</b>	1/29/2021						
	<b>Applicable Bar Date:</b>	11/25/2020						
	<b>Comments:</b>	Claim was filed after Applicable Bar Date.						

Late Filed Claims

**Schedule 1**  
**Late Filed Claims**

In re:Fieldwood Energy LLC, et. Al.  
Case No 20-33948 Jointly Administered

	Claim #	Debtor	Name and Address of Claimant	Secured	Administrative	Priority	Unsecured	Total
<b>Claim To Be Disallowed</b>	<b>926</b>	20-33948 (MI) Fieldwood Energy LLC	<b>Creditor:</b> Nolan Power Group  SBS Nolan Power Group, Inc. 21448 Marion Ln Mandeville, LA 70471	\$0.00	\$0.00	\$0.00	\$14,561.21	\$14,561.21
	<b>Filed On:</b>	2/5/2021						
	<b>Applicable Bar Date:</b>	11/25/2020						
	<b>Comments:</b>	Claim was filed after Applicable Bar Date.						
<b>Claim To Be Disallowed</b>	<b>957</b>	20-33948 (MI) Fieldwood Energy LLC	<b>Creditor:</b> Sigure, Melvin  David C. Whitmore 701 Poydras Street, Suite 4100 New Orleans, LA 70139	Unliquidated	Unliquidated	Unliquidated	Unliquidated	Unliquidated
	<b>Filed On:</b>	3/31/2021						
	<b>Applicable Bar Date:</b>	11/25/2020						
	<b>Comments:</b>	Claim was filed after Applicable Bar Date.						
<b>Claim To Be Disallowed</b>	<b>955</b>	20-33948 (MI) Fieldwood Energy LLC	<b>Creditor:</b> Vegetation Management Specialist, Inc.  Marlene Robin P.O. Box 213 Duson, LA 70529	\$0.00	\$0.00	\$0.00	\$2,164.00	\$2,164.00
	<b>Filed On:</b>	3/25/2021						
	<b>Applicable Bar Date:</b>	11/25/2020						
	<b>Comments:</b>	Claim was filed after Applicable Bar Date.						
<b>Claim To Be Disallowed</b>	<b>958</b>	20-33948 (MI) Fieldwood Energy LLC	<b>Creditor:</b> Wellbore Integrity Solutions, LLC  1310 Rankin Rd. Building 18 Houston, TX 77073	\$0.00	\$0.00	\$0.00	\$1,732.40	\$1,732.40
	<b>Filed On:</b>	4/12/2021						
	<b>Applicable Bar Date:</b>	11/25/2020						
	<b>Comments:</b>	Claim was filed after Applicable Bar Date.						

Late Filed Claims

Schedule 1  
Late Filed Claims

In re:Fieldwood Energy LLC, et. Al.  
Case No 20-33948 Jointly Administered

Claim #	Debtor	Name and Address of Claimant	Secured	Administrative	Priority	Unsecured	Total
Claims To Be Disallowed Totals		8	\$0.00	\$0.00	\$0.00	\$117,804.80	\$117,804.80